

CR 15

00561

SEALED BY ORDER
OF THE COURT

PSG

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

VS.

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

E-filing

LAURENCE MILES, MUNSIF SHIRAZI, a/k/a Mike Shirazi,
ROBERT MICHAEL STEPHENS,
RAYAN LAKSHMANAN, and SHIRLEY ERNESTINE MOLINA,
a/k/a Shirley Jackson, a/k/a Shirley Jacobo, a/k/a Shirley Evans,
a/k/a Shirley Molene, a/k/a Ernestine Moline

INDICTMENT

COUNT 1: 18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud
COUNTS 2-22: 18 U.S.C. § 1343 – Wire Fraud
COUNTS 23-28: 18 U.S.C. § 1957(a) – Engaging in Monetary Transaction
in Property Derived from Specified Unlawful Activity

A true bill.



Foreperson

Filed in open court this 3 day of December
A.D. 2015



United States Magistrate Judge

Bail. \$ NO Bail Arrest warrants as to all

DOCUMENT NO. 1 CS# 15
INITIALS Je
DISTRICT COURT
CRIMINAL CASE NO. 00561

CR 15-0630

IN RE: [Illegible]

DAVID [Illegible]

[Illegible]

[Illegible]

THE UNITED STATES OF AMERICA

VS.

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

[Illegible]

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[Illegible]

E-filing

BRIAN J. STRETCH (CABN 163973)
Acting United States Attorney

SEALED BY ORDER
OF THE COURT

FILED
DEC - 3 2015
SUSAN Y. SOONG
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

LHK
CR 15 00561 PSG

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAURENCE MILES,
MUNSIF SHIRAZI,
a/k/a Mike Shirazi,
ROBERT MICHAEL STEPHENS,
RAYAN LAKSHMANAN, and
SHIRLEY ERNESTINE MOLINA,
a/k/a Shirley Jackson,
a/k/a Shirley Jacobo,
a/k/a Shirley Evans,
a/k/a Shirley Molene,
a/k/a Ernestine Moline,

Defendants.

CASE NO.

VIOLATIONS: 18 U.S.C. § 1349 – Conspiracy; 18
U.S.C. § 1343 – Wire Fraud; 18
U.S.C. § 1957(a) – Engaging in Monetary
Transaction in Property Derived from Specified
Unlawful Activity; 18 U.S.C. §§ 981(a)(1)(C) and
982(a)(1), and 28 U.S.C. § 2461(c)– Forfeiture

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges that, at all relevant times:

1. LAURENCE MILES, MUNSIF SHIRAZI, ROBERT STEPHENS, RAYAN
LAKSHMANAN, and SHIRLEY MOLINA (collectively, “the DEFENDANTS”) , were engaged in a
scheme to defraud whereby they solicited investors to provide money for medical care for “Shirley,”

1 who they claimed was very ill and due to inherit a large estate, in exchange for a share of the estate once
2 its assets were released from an alleged probate proceeding.

3 2. LAURENCE MILES, also called "Lauri," held himself out as the executor and trustee of
4 the estate.

5 3. MUSIF SHIRAZI, also called "Mike", was the assistant to and driver for MILES.

6 4. ROBERT STEPHENS solicited investors and provided them updates on the disbursement
7 of the estate.

8 5. RAYAN LAKSHMANAN was an assistant for STEPHENS, who handled the paperwork
9 and at times recruited investors.

10 6. SHIRLEY MOLINA was the alleged beneficiary of the estate.

11 7. The FEDWIRE system is an electronic funds transfer and book-entry securities transfer
12 service that links twelve Federal Reserve Banks with approximately 10,000 depository institutions
13 nationwide. Every funds transfer sent through FEDWIRE automatically triggers an electronic wire
14 communication to the Funds Transfer Host Application located in East Rutherford, New Jersey, for
15 registration before being transferred to its final destination. As such, all wires alleged in this indictment
16 that used FEDWIRE, were in interstate and foreign commerce.

17 8. The Clearing House Interbank Payments System (CHIPS) is another electronic funds
18 transfer system for processing funds transfers between banks. All wires alleged in this indictment that
19 used CHIPS went through North Carolina and were in interstate and foreign commerce.

20 The Scheme to Defraud

21 9. Beginning in at least 2009 and continuing through November 2015, the DEFENDANTS
22 engaged in a scheme to defraud and to obtain money and property by means of materially false and
23 fraudulent pretenses, representations, and promises.

24 10. The DEFENDANTS solicited funds from investors, purportedly to pay for the expenses
25 of an ill woman's medical care while her money was tied up in a complicated and secret probate
26 proceeding. Investors were told they were investing in a trust set up for "Shirley," and that once the
27 estate was no longer in probate, they would receive a large return on their investment, often as much as
28 one-thousand dollars for every dollar invested.

11. The DEFENDANTS falsely told investors that “Shirley” was very ill, needed medical treatments, and was the heiress to a large estate, often described as being worth more than one-billion dollars. According to the fraudulent story, the estate was tied up in a probate proceeding involving the Federal Reserve. Investors were told the probate was subject to a gag order, such that the DEFENDANTS could not provide details about it.

12. Investors were further told that their money was being used from the trust primarily to pay for “Shirley’s” medical expenses. Once the probate proceeding was finished and the assets available for transfer, investors were told they would receive a large return on the money they had provided.

13. In an effort to keep the scheme going, the DEFENDANTS sent communications, by email, text, phone or letter, to the investors, informing them of some delay in the probate proceedings related to “Shirley’s” estate, in order to lull them into thinking that they would soon receive a return on their investment.

14. In truth, as the DEFENDANTS knew, there was no estate to be settled. As the DEFENDANTS also knew, MOLINA was not extremely ill and was not the heiress to a large estate.

15. The DEFENDANTS have received more than \$5 million from at least 40 different investors.

16. The DEFENDANTS used funds they obtained from their scheme for their own purposes. To divert funds to MOLINA, MILES deposited investor funds into third-party bank accounts. Cash was then withdrawn from those accounts and delivered to MOLINA.

17. As of today, no investor has received any return on their investment.

COUNT ONE: 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud)

18. Paragraphs 1 through 17 are realleged and incorporated as if fully set forth here.

19. From in or about 2009 through in or about November, 2015, in the Northern District of California and elsewhere, the defendants,

LAURENCE MILES,
MUNSIF SHIRAZI,
ROBERT STEPHENS,
RAYAN LAKSHMANAN and
SHIRLEY MOLINA,

1 and others known and unknown to the Grand Jury, did knowingly and intentionally conspire and agree
 2 together and with each other to commit offenses against the United States, specifically, wire fraud, in
 3 violation of Title 18, United States Code, Section 1343, by devising a scheme and artifice to obtain
 4 money by means of false and fraudulent representations, specifically by soliciting investments under the
 5 false and fraudulent pretense that the solicited funds would be used to pay for the medical expenses of a
 6 woman named "Shirley," who was soon to receive an estate, valued at approximately one-billion dollars,
 7 which would then be distributed among the investors, at a high rate of return.

8 The Means and Manner of the Conspiracy

9
 10 20. Among the means and methods by which the DEFENDANTS carried out the conspiracy
 11 to defraud investors were the following:

- 12 A. Soliciting individuals to provide money, with the promise the money would be used to pay
 13 for medical treatments for "Shirley," who was soon to inherit more than a billion dollars,
 14 which money would then be disbursed among those who contributed to her care.
- 15 B. Sending lulling statements to investors, mostly by email or text, to explain why they had not
 16 yet received their funds and to explain the delays in the settlement of Shirley's estate;
- 17 C. Sending Statements of Release forms to investors to make it seem as though the investment
 18 and promised return were legitimate;
- 19 D. Using investors' money for their own purposes, rather than on medical treatments as they
 20 had promised to do;
- 21 E. Pretending to work with the Federal Reserve, judges, and lawyers to settle the estate and
 22 allow for the disbursement of funds, when in fact there was no estate.

23 All in violation of Title 18, United States Code, Section 1349.

24 COUNTS TWO THROUGH TWENTY-THREE: (18 U.S.C. § 1343 – Wire Fraud)

25
 26 21. Paragraphs 1 through 17 and 20 are realleged and incorporated as if fully set forth here.

27 22. On or about the dates set forth below, in the Northern District of California and
 28 elsewhere, the defendants,

LAURENCE MILES,
MUNSIF SHIRAZI,
ROBERT STEPHENS,
RAYAN LAKSHMANAN and
SHIRLEY MOLINA,

for the purpose of executing the above-described scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, and by material omissions, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce the writings, signs, signals, and pictures indicated below:

COUNT	DATE	ITEM WIRED	WIRED FROM	WIRED TO
2	12/08/2010	\$65,000	SA's Bank of America account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
3	03/08/2011	\$1,000	AT's Stanford Federal Credit Union account (via FEDWIRE)	STEPHENS' Umpqua Bank account ending 264
4	03/22/2011	\$23,000	Blue Lapis Funding (JF)'s WFB account (via FEDWIRE)	STEPHENS' Umpqua Bank account ending 264
5	04/26/2011	\$6,000	DM's Citibank account (via FEDWIRE)	STEPHENS' Umpqua Bank account ending 264
6	05/13/2011	\$35,000	DM's Citibank account (via CHIPS)	MILES Trust account ending 4117 at WFB
7	05/19/2011	\$5,000	Richland Corp. (BB)'s account at WFB (via FEDWIRE)	STEPHENS' Umpqua Bank account ending 264
8	06/30/2011	\$10,000	DM's Citibank account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
9	06/30/2011	\$34,000	FN's JP Morgan Chase account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
10	12/23/2011	\$65,000	RLJ's Umpqua account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
11	03/02/2012	\$57,000	CC's Citibank account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
12	03/12/2012	\$60,000	CC's Citibank account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
13	01/24/2013	\$20,000	Provenance Ltd. (SK)'s account at RBS Citizens, NA (via FEDWIRE)	MILES Trust account ending 4117 at WFB
14	02/08/2013	\$13,000	CB's Provident Bank account (via FEDWIRE)	MILES Trust account ending 4117 at WFB

15	04/29/2013	\$20,000	SK's Live Oak State Bank account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
16	05/01/2013	\$12,000	Provenance Ltd. (SK)'s account at RBS Citizens, NA (via FEDWIRE)	MILES Trust account ending 4117 at WFB
17	12/13/2013	\$25,000	Provenance Ltd. (SK)'s account at RBS Citizens, NA (via FEDWIRE)	MILES Trust account ending 4117 at WFB
18	06/18/2014	\$40,000	CB's Merrill Lynch/Bank of America account (via FEDWIRE)	MILES Trust account ending 4117 at WFB
19	07/21/2014	\$30,000	CC's WFB account (via FEDWIRE)	SHIRAZI's JP Morgan Chase account ending 580
20	07/29/2014	\$30,000	CC's WFB account (via FEDWIRE)	SHIRAZI's JP Morgan Chase account ending 580
21	08/05/2014	\$12,000	CC's WFB account (via FEDWIRE)	SHIRAZI's JP Morgan Chase account ending 580
22	02/10/2015	\$10,000	CC's WFB account (via FEDWIRE)	Relevance LLC's Citibank account ending 886
23	03/04/2015	\$40,000	CC's WFB account (via FEDWIRE)	SHIRAZI's Citibank account ending 5794

All in violation of Title 18, United States Code, Section 1343.

COUNTS TWENTY-FOUR THROUGH TWENTY-NINE: (18 U.S.C. § 1957(a) – Engaging in Monetary Transaction in Property Derived from Specified Unlawful Activity)

23. The allegations set forth in paragraphs 1 through 17 and 20 are realleged and incorporated as if fully set forth here.

24. On or about the dates listed below, in the Northern District of California and elsewhere, the defendant, as indicated below, did knowingly engage in the following monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, specifically, the withdrawal or transfer of funds as indicated below, which funds were derived from a specified unlawful activity, namely, wire fraud:

COUNT	DEFENDANT	DATE	MONETARY TRANSACTION
24	ROBERT STEPHENS	03/22/2011	Transfer of \$20,000 from Umpqua account ending 0264 to WFB account ending 4117
25	LAURENCE MILES	05/13/2011	Withdrawal of \$30,000 from WFB account ending 4117
26	LAURENCE MILES	03/13/2012	Withdrawal of \$30,000 from WFB account ending 4117

27	LAURENCE MILES	08/26/2013	Withdrawal of \$23,500 from WFB account ending 9313
28	LAURENCE MILES	10/08/2013	Transfer of \$21,000 from WFB account ending 4117 to WFB account ending 8480
29	MUNSIF SHIRAZI	03/04/2015	Transfer of \$38,500 from Citi account ending 5794 to Citi account ending 9886

All in violation of Title 18, United States Code, Section 1957(a).

FORFEITURE ALLEGATION: (18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1); and 28 U.S.C. § 2461(c))

25. Paragraphs 1 through 17 and 20, and the transactions alleged in each of Counts One through Twenty-Eight, are realleged as if fully set forth here.

26. Upon a conviction of any of the offenses alleged in Counts One through Twenty-Two, the defendants,

LAURENCE MILES,
MUNSIF SHIRAZI,
ROBERT STEPHENS,
RAYAN LAKSHMANAN and
SHIRLEY MOLINA,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations.

27. Upon a conviction of any of the offenses alleged in Counts Twenty-Three through Twenty-Eight, the defendants,

LAURENCE MILES,
MUNSIF SHIRAZI, and
ROBERT STEPHENS,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real and personal, involved in said violations, or any property traceable to such property.

28. If any of the forfeitable property, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to or deposited with a third person;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty;

1 the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States
2 Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

3 All in violation of Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), 1343, 1957;
4 Title 28, United States Code, Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

5
6 DATED: 3 Dec 2015

A TRUE BILL,

FOREPERSON

7
8
9 BRIAN STRETCH
10 Acting United States Attorney

11
12 JEFFREY D. NEDROW
13 Chief, San Jose Branch

14 (Approved as to form:)
15 AUSA ROSEN

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED
 COUNT 1: 18 U.S.C. § 1349 – Conspiracy to Commit Wire Fraud
 COUNTS 2-22: 18 U.S.C. § 1343 – Wire Fraud
 COUNTS 23-28: 18 U.S.C. § 1957(a) – Engaging in Monetary Transaction in Property Derived from Specified Unlawful Activity

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

SEE ATTACHED SHEET

CR 15

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

E-filing**DEFENDANT - U.S.**

LAURENCE MILES

DISTRICT COURT NUMBER

DEC - 3 2015**00561**
 SUBAN Y. BOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE
LHK**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior summons was served on above charges
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted☒ U.S. Attorney ☐ Other U.S. Agency

Name and Office of Person

Furnishing Information on this form BRIAN STRETCH

Name of Assistant U.S.

Attorney (if assigned) AUSA AMBER ROSEN

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: None

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

Δ1

COUNT ONE: 18 USC 1349 – Conspiracy to commit wire fraud

20 years prison

\$250,000 fine or twice the gross gain or loss from the offense

3 years supervised release

\$100 Special Assessment fee

COUNTS TWO – TWENTY-TWO: 18 USC 1343 – Wire fraud

20 years prison

\$250,000 fine or twice the gross gain or loss from the offense

3 years supervised release

\$100 Special Assessment fee

**COUNTS TWENTY-THREE – TWENTY-EIGHT: 18 USC 1957(a) –
Engaging in Monetary Transaction in Property derived from Specified Unlawful
Activity**

10 years prison

\$250,000 fine, or twice the amount of the criminally derived property involved in
the transaction

3 years supervised release

\$100 Special Assessment

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
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☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

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NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

MUNSIF SHIRAZI a/k/a Mike Shirazi

DISTRICT COURT NUMBER

 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI S/A MATT ACCARDO

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form BRIAN STRETCH

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) AUSA AMBER ROSEN

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☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: None

If Summons, complete following:

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Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments:

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20 years prison

\$250,000 fine or twice the gross gain or loss from the offense

3 years supervised release

\$100 Special Assessment fee

COUNTS TWO – TWENTY-TWO: 18 USC 1343 – Wire fraud

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**COUNTS TWENTY-THREE – TWENTY-EIGHT: 18 USC 1957(a) –
Engaging in Monetary Transaction in Property derived from Specified Unlawful
Activity**

10 years prison

\$250,000 fine, or twice the amount of the criminally derived property involved in
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3 years supervised release

\$100 Special Assessment

Δ2

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
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PENALTY:

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Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

ROBERT MICHAEL STEPHENS

DISTRICT COURT NUMBER

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI S/A MATT ACCARDO

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

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Name and Office of Person

Furnishing Information on this form BRIAN STRETCH

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) AUSA AMBER ROSEN

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If "Yes" give date filed

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Or... if Arresting Agency & Warrant were not

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Bail Amount: None

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

Δ3

COUNT ONE: 18 USC 1349 – Conspiracy to commit wire fraud

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3 years supervised release

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**COUNTS TWENTY-THREE – TWENTY-EIGHT: 18 USC 1957(a) –
Engaging in Monetary Transaction in Property derived from Specified Unlawful
Activity**

10 years prison

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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

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COUNTS 2-22: 18 U.S.C. § 1343 – Wire Fraud

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☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: SEE ATTACHED SHEET

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

▶ RAYAN LAKSHMANAN

DISTRICT COURT NUMBER

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI S/A MATT ACCARDO

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District
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☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned)

AUSA AMBER ROSEN

IS NOT IN CUSTODY

Has not been arrested, pending outcome of proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: None

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

A4

COUNT ONE: 18 USC 1349 – Conspiracy to commit wire fraud

20 years prison

\$250,000 fine or twice the gross gain or loss from the offense

3 years supervised release

\$100 Special Assessment fee

COUNTS TWO – TWENTY-TWO: 18 USC 1343 – Wire fraud

20 years prison

\$250,000 fine or twice the gross gain or loss from the offense

3 years supervised release

\$100 Special Assessment fee

Δ 4

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING

OFFENSE CHARGED

COUNT 1: 18 U.S.C. § 1349 - Conspiracy to Commit Wire Fraud

COUNTS 2-22: 18 U.S.C. § 1343 - Wire Fraud

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY:

SEE ATTACHED SHEET

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

 Shirley Ernestine Molina, a/k/a Shirley Jackson,
 a/k/a Shirley Jacobo, a/k/a Shirley Evans, a/k/a
 Shirley Molene, a/k/a Ernestine Moline
 DISTRICT COURT NUMBER

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI S/A MATT ACCARDO

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

Name and Office of Person

Furnishing Information on this form BRIAN STRETCH

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

AUSA AMBER ROSEN

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2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

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 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

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TO U.S. CUSTODY

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ADDITIONAL INFORMATION OR COMMENTS

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Before Judge:

Comments:

15

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3 years supervised release

\$100 Special Assessment fee

15